

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:22-cv-22706-RNS**

BELL NORTHERN RESEARCH, LLC,

Plaintiff

v.

**JURY TRIAL DEMANDED**

HMD AMERICA, INC.; HMD GLOBAL OY;  
SHENZHEN CHINO-E COMMUNICATION  
CO., LTD.; TINNO MOBILE  
TECHNOLOGY CORP.; SHENZHEN  
TINNO MOBILE CO., LTD.; TINNO USA,  
INC.; UNISOC TECHNOLOGIES CO., LTD.;  
WINGTECH TECHNOLOGY CO.; LTD.;  
WINGTECH INTERNATIONAL, INC.;  
BEST BUY CO., INC.; BEST BUY STORES  
L.P.; TARGET CORP.; WALMART INC.

Defendants.

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**PLAINTIFF BELL NORTHERN RESEARCH, LLC'S UNOPPOSED MOTION TO  
DISMISS WITHOUT PREJUDICE DEFENDANTS WINGTECH TECHNOLOGY CO.,  
LTD., AND WINGTECH INTERNATIONAL, INC.**

Plaintiff Bell Northern Research, LLC (“BNR” or “Plaintiff”), pursuant to Fed. R. Civ. P. 41(a)(2), hereby moves this Honorable Court to grant its motion for an order dismissing all claims in this action asserted against Defendants Wingtech Technology Co., Ltd., and Wingtech International, Inc. (“Defendant” or “Wingtech”) without prejudice. BNR submits that Wingtech has not pleaded any counterclaims, and that the terms of this dismissal without prejudice are proper in that BNR and Wingtech have reached an agreement. BNR and Wingtech shall bear their own costs, expenses, and attorneys’ fees. A proposed order of dismissal accompanies this motion.

Dated: August 11, 2023

Respectfully submitted,

/s/ Paul Richter

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*Attorneys for Plaintiff Bell Northern  
Research, LLC*

### **CERTIFICATION OF PRE-FILING CONFERENCE**

Pursuant to Local Rule 7.1(a)(3), the undersigned counsel for Plaintiff Bell Northern Research, LLC certifies that Plaintiff's counsel conferred on August 10, 2023 on all of the issues raised in this motion with counsel for all of the Defendants in this action that have entered an appearance, namely: HMD America, Inc., HMD Global Oy (collectively, "HMD"), Best Buy Co., Inc., Best Buy Stores L.P. (collectively, "Best Buy"), Target Corp. ("Target"), Walmart Inc. ("Walmart"), and Wingtech.

Counsel for HMD, Target, and Best Buy indicated they do not oppose this motion "so long as BNR will not use the absence of [Wingtech] from discovery or the case to prejudice the other defendants." Counsel for Walmart indicated that they will not oppose the motion with the same understanding. Wingtech does not oppose the motion.

The movant has conferred with all parties or non-parties who may be affected by the relief requested.

/s/ Paul Richter  
Paul Richter

### **CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document on August 11, 2023.

/s/ Jose I. Rojas  
Jose I. Rojas